

Hearing Date and Time: January 5, 2006 at 10:00 a.m.
Objection Deadline: December 29, 2005

Brent C. Strickland (BS 7811)
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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:)	
)	
DELPHI CORPORATION, <i>et al.</i> ,)	Chapter 11 Case No. 05-44481 (RDD)
)	
)	(Jointly Administered)
Debtors.)	
)	
)	

**NOTICE OF MOTION FOR ORDER OF RELIEF FROM AUTOMATIC STAY TO
PROVIDE NOTICE OF DEFAULT AND TERMINATE SALES AGREEMENT
BETWEEN PEPCO ENERGY SERVICES, INC. AND DEBTORS, OR IN THE
ALTERNATIVE, FOR ORDER COMPELLING DEBTORS TO
ASSUME OR REJECT SALES AGREEMENT**

PLEASE TAKE NOTICE that on November 21, 2005, Pepco Energy Services, Inc. ("PES"), by its undersigned counsel, filed a Motion for Order of Relief from Automatic Stay to Provide Notice of Default and Terminate Sales Agreement Between PEPCO Energy Services, Inc. and Debtors, or in the Alternative, for Order Compelling Debtors to Assume or Reject Sales Agreement (the "Motion").

The Motion is on file with and may be reviewed at the Office of the Clerk, United States Bankruptcy Court for the Southern District of New York, One Bowling Green New York, NY 10004-1408, or may request a copy from the undersigned.

The Court will hold a hearing on the Motion on January 5, 2006 at 10:00 a.m. EST.

ANY PARTY IN INTEREST WISHING TO OPPOSE THE MOTION MUST FILE AN OBJECTION IN WRITING, SPECIFICALLY STATING THE FACTUAL AND LEGAL NATURE OF THE OBJECTION WITH THE CLERK, UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF NEW YORK, U.S. COURTHOUSE, ONE BOWLING GREEN, NEW YORK, NY 10004-1408, AND MUST SERVE A COPY ON THE UNDERSIGNED BY DECEMBER 29, 2005.

ABSENT A TIMELY OBJECTION, THE COURT MAY TREAT THIS PLEADING AS UNOPPOSED AND GRANT THE RELIEF REQUESTED. ANY PARTY REQUESTING FURTHER INFORMATION WITH RESPECT TO THE MOTION MAY CONTACT THE UNDERSIGNED.

Date: November 21, 2005

/s/ Brent C. Strickland
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